

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

JUL 17 2013

for the

SOUTHERN

David J. Bradley, Clerk

United States of America

v.

Case No. M-13-1288-M

FLORES, Guillermo Jr.

Year of birth: 1982 usc

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 7/16/2013 in the county of Starr in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 841 (a) (1)

Possession with Intent to Distribute
Marijuana, approximately 257.18
Kilograms, a schedule I controlled
substance.

This criminal complaint is based on these facts:

(See Attachment I).

☒ Continued on the attached sheet.

App'd to file

[Signature]

Grady Leopold, USA

Complainant's signature

Joshua Hansen, Special Agent DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: 7/17/2013

8:27am

Judge's signature

Peter Ormsby, US Magistrate Judge

Printed name and title

City and state: La Grulla, TX

Attachment I

1. On July 16, 2013, at approximately 11:26 a.m., USBP Rio Grande City Border Patrol Agents were conducting line watch operations in La Grulla, Texas, when they observed a silver pick up traveling south towards the Rio Grande River, in the area of La Grulla city pump. Approximately ten minutes later they observed the silver Ford F-150 traveling north from the La Grulla city pumps at a high rate of speed.
2. USBP agents attempted to conduct a traffic stop on the silver Ford F-150 to perform an immigration inspection on the driver near the intersection of FM 2360 and Las Palmas Street. The Ford F-150 failed to yield and attempted to evade USBP units.
3. USBP agents observed the vehicle come to an abrupt stop at the corner of Lodge Street and Leopoldo Longoria Street. USBP agents observed the driver exit the vehicle and proceeded to run south on Lodge Street and jumped a fence onto the property of a corner residence on Lodge Street. USBP agents described the driver as a bald male wearing black sunglasses, a white t-shirt with a Rhino Logo on the front, dark blue jeans, and white tennis shoes. USBP agents momentarily lost sight of the driver. A short time later, USBP agents observed the same subject walking from the same residential back yard. USBP agents described the subject as sweating profusely and bleeding from a cut on his hand. USBP agents then detained one Hispanic male identified as FLORES, Guillermo Jr. At that time USBP agents positively identified FLORES as the subject driving the silver Ford F-150 moments earlier.
4. Upon further inspection of the silver Ford F-150, USBP agents discovered 33 bundles of suspected marijuana weighing approximately 257.18 kgs. FLORES along with the 33 bundles of marijuana were transported to the Rio Grande City, Texas USBP Station for processing.
5. At approximately 4:30 p.m., Agents Joshua Hansen, Leon Pauley and Rene Gonzalez arrived at the Rio Grande City Texas USBP station. At approximately 4:41 p.m. SA Pauley read FLORES his Miranda Warnings and conducted an interview of FLORES.
6. FLORES stated he was approached by unknown individuals regarding a debt from approximately 2009 of \$172, 000. In lieu of the debt, FLORES stated he was hired by the unknown individual to rent the silver Ford F-150 approximately 1 and a half weeks ago. FLORES stated the truck would be utilized by unknown individuals to move unknown amounts of marijuana from the Rio Grande River to the McAllen, TX area
7. FLORES stated on July 16, 2013, he parked the vehicle at the Border Town store in La Gulla, TX in order for unknown individuals to pick up the vehicle for the purpose of transporting marijuana from the Rio Grande River to the McAllen, TX area. The vehicle was then to be returned to him at the same location.
8. FLORES denied being the driver of the silver Ford F-150 USBP agents were pursuing.